Colvin, Judith

From: mweo-bounces@water.ca.gov on behalf of Harrelson,Diane L [dharrelson@mwdh2o.com]
Sent: Thursday, March 27, 2008 4:56 PM
To: mweo@water.ca.gov
Cc: Sienkiewich, Andrew; Hui,Andy; Stephen Arakawa; Blair, Tim
Subject: [MWEO] Comments on Draft Model Water Efficient Landscape Ordinance
Attachments: MWD Comments on Draft Model Water Efficient LandscapeOrdinance.PDF

Dear Ms. Colvin,

Thank you for this opportunity to provide comments on the Draft Model Water Efficient Landscape Ordinance.

<<MWD Comments on Draft Model Water Efficient Landscape Ordinance.PDF>>

Diane Harrelson
www.bewaterwise.com

Metropolitan Water District

of Southern California

P.O. Box 54153

Los Angeles, California 90054-0153

Phone: 213.217.6167

Fax: 213.576.5232

MWD
METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

Executive Office

March 27, 2008

Ms. Judy Colvin
Office of Water Use Efficiency and Transfers
Department of Water Resources
P.O. Box 942836
Sacramento, CA 94236-0001

Dear Ms. Colvin:

Comments on the Draft Model Water Efficient Landscape Ordinance

Thank you for the opportunity to comment on the Draft Model Water Efficient Landscape Ordinance. The Metropolitan Water District of Southern California (Metropolitan) supports Department of Water Resources' mission of updating California's Model Water Efficient Landscape Ordinance but would like to see changes to some specific requirements being proposed. As a member of the AB 2717 Landscape Taskforce, Metropolitan helped formulate many of the recommendations leading to your update.

Metropolitan has long supported landscape water efficiency though many of its incentive programs:

- California Friendly Landscape Irrigation Efficiency Training
- Weather-Based Irrigation Controller rebates
- Stream rotor rebates
- Rotating nozzle rebates
- Performance based incentive programs
- Public education campaign for native and California Friendly plants
- Recycled water

Provisions We Support

Metropolitan specifically supports the following updated provisions in the proposed Model Water Efficient Landscape Ordinance:

(1) Reduction of the ET adjustment water factor from 0.8 to 0.7. Metropolitan is well aware that a reduction in the water factor is achievable from its field work on California Friendly landscapes. These landscapes were required to meet specifications for hardware and plants and have achieved beautiful landscape plans using a 0.72 water factor.

700 N. Alameda Street, Los Angeles, California 90012 • Mailing Address: Box 54153, Los Angeles, California 90054-0153 • Telephone (213) 217-6000

(2) Application of this ordinance to residences with landscapes in excess of 2,500 square feet. The application of this ordinance to residences over 2,500 square feet brings accountability to the growth over the last two decades of the properties' landscape size and targets these large lots which use a higher percentage of water outdoors than in prior years.

(3) The requirement that local alternative ordinances be at least as effective as the state model ordinance. Requiring local ordinances to be at least as effective as the state model ordinance closes a large loophole that currently exists. Because the law does not currently specify that local ordinances meet any specific requirements or standards, many of them are not as effective as the existing Model Ordinance.

Suggested Changes

Metropolitan does not support ongoing audits and surveys being a provision of the ordinance. This requirement creates a subtle move from a design and construction standard to a continuous performance standard without adequate studies to support such a move. Audits and surveys will result in an unfunded mandate on local agencies. Beyond the scope of the original recommendations there is no clear plan for how cities and counties, who must implement the ordinance, and those conducting the surveys and audits would work together. The merits of audits compared to other performance motivators such as escalating block rate structures or water budget feedback loops warrants further investigation.

In addition, Metropolitan would like to see the addition of a higher maximum applied water allowance for the use of recycled water. This would create an incentive for use of recycled water and would allow a savings of 100 percent of landscape water demand at a site creating a double win of recycled water use and protection of the state's receiving waters as recycled water use permits have strict controls on runoff.

Again, thank you for the opportunity to provide comments.

Sincerely,

Stephen M. Arakawa

Stephen Arakawa, Manager
Water Resources Group

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